

EXHIBIT 45
[FILED UNDER SEAL]


UNDER PROTECTIVE ORDER

Page 1

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE EASTERN DISTRICT OF TEXAS
4 SHERMAN DIVISION

5 -----x
6 THE STATE OF TEXAS, et al.,
7 Plaintiffs,
8 -against- Civil Action No.
4:20-cv-00957-SDJ
9 GOOGLE LLC,
10 Defendant.

11 -----x
12 HIGHLY CONFIDENTIAL
13 REMOTE VIDEOTAPED DEPOSITION OF

14 
New York, New York
May 2, 2024

15
16
17 Reported By:
18 ERIC J. FINZ
19
20
21
22
23
24

25 Job No. CS6670189

UNDER PROTECTIVE ORDER

Page 58

1 [REDACTED] - HIGHLY CONFIDENTIAL

2 Q. [REDACTED]

3 [REDACTED]

4 MR. CHANG: Objection; form.

5 A. [REDACTED]

6 Q. [REDACTED]

7 [REDACTED]

8 A. [REDACTED]

9 Q. [REDACTED]

10 [REDACTED]

11 A. [REDACTED]

12 Q. [REDACTED]

13 [REDACTED]

14 A. [REDACTED]

15 Q. [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 A. [REDACTED]

19 Q. [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 A. [REDACTED]

23 Q. [REDACTED]

24 [REDACTED]

25 A. [REDACTED]

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1 [REDACTED] - HIGHLY CONFIDENTIAL

2 Q. [REDACTED]?

3 A. [REDACTED]

4 [REDACTED]

5 Q. [REDACTED]

6 [REDACTED]

7 A. [REDACTED]

8 Q. [REDACTED]

9 [REDACTED]?

10 A. [REDACTED]

11 Q. [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 A. [REDACTED]

16 Q. [REDACTED]

17 [REDACTED]

18 A. [REDACTED]

19 Q. [REDACTED]

20 A. [REDACTED]

21 Q. [REDACTED]

22 A. [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 Q. [REDACTED]

Page 60

1 [REDACTED] - HIGHLY CONFIDENTIAL

2 [REDACTED]

3 A. [REDACTED]

4 Q. [REDACTED]

5 [REDACTED]

6 A. [REDACTED]

7 Q. [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 A. [REDACTED]

11 Q. [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 A. [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 Q. [REDACTED]

18 [REDACTED]

19 A. [REDACTED]

20 [REDACTED]

21 Q. [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

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1 [REDACTED] - HIGHLY CONFIDENTIAL

2 [REDACTED]

3 A. [REDACTED]

4 Q. [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 A. [REDACTED]

10 Q. [REDACTED]?

11 A. [REDACTED]

12 Q. [REDACTED]

13 [REDACTED]

14 A. [REDACTED]

15 [REDACTED]

16 Q. [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 MR. CHANG: Objection; form.

20 A. [REDACTED]

21 Q. [REDACTED]

22 A. [REDACTED]

23 [REDACTED]

24 Q. [REDACTED]

25 A. [REDACTED]

UNDER PROTECTIVE ORDER

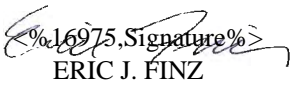
Page 142

1 [REDACTED] - HIGHLY CONFIDENTIAL
2 CONTINUED EXAMINATION
3 BY MR. CHANG:
4 Q. [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 A. [REDACTED]
8 Q. [REDACTED]
9 [REDACTED]
10 A. [REDACTED]
11 MR. CHANG: No further
12 questions.
13 MS. CASTLE: Thank you. We'll
14 review and sign.
15 THE VIDEOGRAPHER: Off the
16 record at 2:41 p.m. EDT. This
17 concludes the testimony given by
18 [REDACTED]. The total number of
19 media used was six, and will be
20 retained by Veritext.
21 (Time noted: 2:41 p.m.)
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23
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1 CORNER - HIGHLY CONFIDENTIAL
2 STATE OF _____)
3 ss:
4 COUNTY OF _____)
5
6 I, [REDACTED], the witness herein,
7 having read the foregoing testimony of
8 the pages of this deposition, do hereby
9 certify it to be a true and correct
10 transcript, subject to the corrections,
11 if any, shown on the attached page.
12
13
14
15 [REDACTED]
16
17 Subscribed and sworn to before me
18
19 This ____ day of _____, 2024.
20
21
22
23 _____
24 Notary Public
25 Job No. CS6670189

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1 [REDACTED] - HIGHLY CONFIDENTIAL
2 C E R T I F I C A T E
3 STATE OF NEW YORK)
4 : ss.
5
6 COUNTY OF NEW YORK)
7
8 I, ERIC J. FINZ, a Shorthand
9 Reporter and Notary Public within and for
10 the State of New York, do hereby certify:
11 That [REDACTED], the witness whose
12 deposition is hereinbefore set forth, was
13 duly sworn by me and that such deposition
14 is a true record of the testimony given
15 by the witness.
16 I further certify that I am not
17 related to any of the parties to this
18 action by blood or marriage, and that I
19 am in no way interested in the outcome of
20 this matter.
21 IN WITNESS WHEREOF, I have hereunto
22 set my hand this 2nd day of May, 2024.
23
24 
25 ERIC J. FINZ

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1 [REDACTED] - HIGHLY CONFIDENTIAL
2 E X H I B I T S
3 DESCRIPTION PAGE
4 (Amex Exhibit 1 for 8
5 identification, notice of
6 deposition.)
7 (Amex Exhibit 2 for 9
8 identification, non-party
9 American Express, Inc.'s
10 Responses and Objections to
11 Defendant's Subpoena to Testify
12 At a Deposition in a Civil
13 Action.)
14 (Amex Exhibit 3 for 24
15 identification, document headed
16 [REDACTED]
17 production numbers AMEX_DOJ 197
18 through AMEX_DOJ 251.)
19 (Amex Exhibit 4 for 43
20 identification, email dated
21 December 7, 2021, production
22 numbers AMEX_DOJ_000001 through
23 AMEX_DOJ_000018.)
24
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UNDER PROTECTIVE ORDER

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1 [REDACTED] - HIGHLY CONFIDENTIAL
2 E X H I B I T S (Continued)
3 DESCRIPTION PAGE
4 (Amex Exhibit 5 for 68
5 identification, document headed
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 AMEX_DOJ_000252 through
10 AMEX_DOJ_000266.)
11 (Amex Exhibit 6 for 78
12 identification, document headed
13 [REDACTED]
14 [REDACTED] production
15 numbers AMEX_GOOGLE 000074
16 through AMEX_GOOGLE 000089.)
17 (Amex Exhibit 7 for 102
18 identification, computer
19 printout, production numbers
20 AMEX_GOOGLE 91.)
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1 [REDACTED] - HIGHLY CONFIDENTIAL
2 REQUESTS FOR DOCUMENTS AND/OR
3 INFORMATION
4 PAGE
5 (Request for production.) 86
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1 [REDACTED] - HIGHLY CONFIDENTIAL
2 ERRATA
3 I wish to make the following changes for
4 the following reasons:
5 PAGE LINE
6 ____ CHANGE ____
7 REASON: ____
8 ____ CHANGE ____
9 REASON: ____
10 ____ CHANGE ____
11 REASON: ____
12 ____ CHANGE ____
13 REASON: ____
14 ____ CHANGE ____
15 REASON: ____
16 ____ CHANGE ____
17 REASON: ____
18 ____ CHANGE ____
19 REASON: ____
20 ____ CHANGE ____
21 REASON: ____
22 [REDACTED]
23 Subscribed and sworn to before me
24 this ____ day of ____, 2024.
25
Job No. CS6670189

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1 NICOLE L. CASTLE, ESQ.
2 [REDACTED]
3 May 2, 2024
4 RE: The State Of Texas, Et Al. v. Google LLC
5 5/2/2024, [REDACTED] (#6670189)
6 The above-referenced transcript is available for
7 review.
8 Within the applicable timeframe, the witness should
9 read the testimony to verify its accuracy. If there are
10 any changes, the witness should note those with the
11 reason, on the attached Errata Sheet.
12 The witness should sign the Acknowledgment of
13 Deponent and Errata and return to the deposing attorney.
14 Copies should be sent to all counsel, and to Veritext at
15 erratas-cs@veritext.com.
16 Return completed errata within 30 days from
17 receipt of testimony.
18 If the witness fails to do so within the time
19 allotted, the transcript may be used as if signed.
20
21
22 Yours,
23 Veritext Legal Solutions
24
25